

O'Connor met at the DNC with Fowler on April 28, just as he told Avent and Schmidt he would. At the meeting, which is described in detail above in Section II.E.2.f., O'Connor and the opponent tribal leaders and lobbyists asked Fowler to call Ickes and have him contact Interior about the Hudson application, which Fowler agreed to do. Fowler and Ickes spoke about the Hudson matter within days thereafter, and Fowler told Ickes that he had met with opponents to the Hudson casino who were supporters of the DNC, that "they were on our side."<sup>298</sup> As noted above in Section II.E.2.g.1., Fowler testified that he told Ickes that Interior's purported determination to approve the Hudson casino should be reconsidered in light of the deficiencies in the process the opponents had pointed out to Fowler. Ickes told Fowler that he would look into the Hudson matter and asked Fowler for a memo on the issue.

Ickes was a logical person for Fowler to contact at the White House regarding a constituent matter. Ickes was the Administration's main point of contact with the DNC, and Fowler had developed a close working relationship with him. As the Deputy Chief of Staff for Policy and Political Affairs, Ickes also was the White House's primary liaison for political matters generally. Further, Ickes was in a position to speak for the Administration on matters of policy.<sup>299</sup>

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<sup>297</sup>(...continued)

Ickes had called O'Connor at the time he had this discussion with Sibbison.

For her part, Sibbison does not recall such a conversation and thinks it is something she would have both remembered and probably would have brought to John Duffy's attention.

<sup>298</sup>Fowler G.J. Test. at 144.

<sup>299</sup>Fowler insisted that matters like the Hudson application merit White House attention because it is effectively a matter of policy for the Administration to determine how to apply statutes such as IGRA.